

LAW OFFICES OF MALLON & TRANGER  
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Attorneys for Plaintiff, John P. Saddy

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
TRENTON VICINAGE

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**JOHN P. SADDY** : Civil No. 18-16137  
Plaintiff, : (FLW/LHG)  
v. :  
BOROUGH OF SEASIDE HEIGHTS; :  
**CHRISTOPHER VAZ**, Seaside Heights Borough:  
Administrator; **ANTHONY E. VAZ**, : PLAINTIFF'S ANSWER  
Seaside Heights Mayor; **RICHARD TOMPKINS**; : TO DEFENDANTS'  
**MICHAEL CARBONE**; **LOUIS DIGULIO**; : COUNTERCLAIM FOR  
**AGNES POLHEMUS**; **HARRY SMITH**; : ATTORNEY'S FEES  
**VICTORIA GRAICHEN**, Seaside Heights :  
Council members; **KENNETH ROBERTS**, :  
Zoning Officer; :  
**CHARLES LASKEY**, Building Inspector; :  
**THOMAS BOYD**, Chief of Police; :  
**SERGEANT LUIGI VIOLANTE**, a Seaside :  
Heights police officer; **JOHN DOES 1-10**, :  
Seaside Heights police officers; and :  
**JOHN DOES 11-20**, Seaside Heights :  
Council Members; Municipal Employees; :  
Officials; and/or Appointees, :  
Defendants. :  
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Plaintiff, John P. Saddy, hereby answers the Counterclaim  
for Attorney's Fees asserted by Defendants as follows:

1. Plaintiff denies that the allegations contained in his  
complaint or any amended complaint as to Defendants, Richard  
Tompkins, Michael Carbone, Louis DiGulio, Agnes Polhemus,

Harry Smith, Victoria Graichen, Kenneth Roberts, Charles Lasky, Sergeant Luigi Violante, and Anthony E. Vaz are frivolous, groundless, and without merit.

2. Neither admitted nor denied as the statement is a legal conclusion to which no response is required.

**WHEREFORE**, it is requested that relief and judgment be entered in favor of Plaintiff and against Defendants, including, but not limited to, for reasonable attorney's fees, costs of suit, and such other relief as the Court deems equitable and just.

MALLON & TRANGER

By:

  
SURINDER K. AGGARWAL

Dated: March 19, 2019

CERTIFICATION OF SERVICE

The undersigned hereby certifies as follows:

1. I am an attorney licensed to practice law in the State of New Jersey and admitted to the United States District Court for the District of New Jersey. I am an associate employed by the Law Offices of Mallon & Tranger, which represents Plaintiff, John P. Saddy, in the above-captioned matter.
2. On the 19<sup>nd</sup> day of March, 2019, I served Plaintiff's Answer to Defendants' Counterclaim for Attorney's Fees via ECF upon all counsel of record.

I certify that the foregoing statements made by me are true and correct. I am aware that if any of the statements made by me are willfully false, I am subject to punishment.



SURINDER K. AGGARWAL

Dated: March 19, 2019